

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

DAVID TOM, on behalf of
himself and others similarly situated,

Plaintiff,

DELANCEY STREET GROUP LLC d/b/a
MCA JUSTICE,

Defendant.

Case No. 1:25-cv-566 (GTS/DJS)

Thomas A. Leghorn, declares, pursuant to the provisions of 28 U.S.C §1746:

1. I am a partner at the law firm of London Fischer LLP, attorneys for Defendant DELANCEY STREET GROUP LLC (IMPROPERLY PLED AS DELANCEY STREET GROUP LLP D/B/A MCA JUSTICE) (“Delancey Street”). I am fully familiar with the facts and circumstances of this case and the file maintained in my office.

2. This declaration is submitted, together with the exhibits annexed hereto and the Memorandum of law in support of Defendant’s motion seeking dismissal of Plaintiff’s Complaint in its entirety pursuant to Fed. R. Civ. P. 12(b)(6) with prejudice, and granting such other, further and different relief as this Court deems just and proper.

3. Attached hereto Exhibit “A” is a true and accurate copy of Plaintiff’s Complaint. (ECF Doc. 1).

4. Attached hereto as “Exhibit B” is a true and accurate copy of the Independent Sales Organization (ISO) Agreement between Delancey Street and MJA Holding, Inc.

5. Attached hereto as “Exhibit C” is a true and accurate copy of an email from MJA Holdings, Inc., providing its email address as info@mca-justice.com.

6. Attached hereto as “Exhibit D” is a true and accurate copy of the email correspondence between Plaintiff David Tom and “John” at MCA Justice.

7. Attached hereto as “Exhibit E” is a true and accurate copy of the email correspondence from Plaintiff David Tom and Delancey Street Group, LLC.

8. Attached hereto as “Exhibit F” is a true and accurate copy of a portion of the Excel spreadsheet downloaded from [Complete Federal Firearms Listings | Bureau of Alcohol, Tobacco, Firearms and Explosives](#) – Complete Listing (.xlsx) – which shows the phone number (321) 917-0760 – is listed for Tom and Company LLC and GoingQuiet.com.

9. **WHEREFORE**, it is respectfully requested that this Court grant Defendant DELANCEY STREET’s motion to dismiss plaintiff’s Complaint in its entirety pursuant to Fed. R. Civ. P. 12(b)(6) with prejudice, and granting such other, further, and different relief as this Court deems just and proper.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 23, 2025

Respectfully submitted,
LONDON FISCHER LLP

By: /s/ Thomas Leghorn
Thomas A. Leghorn, Esq. (TL6244)
*Attorneys for Defendant DELANCEY STREET
GROUP LLC (IMPROPERLY PLED AS
DELANCEY STREET GROUP LLP D/B/A MCA
JUSTICE)*
59 Maiden Lane
New York, New York 10038
(212) 972-1000
TLeghorn@londonfischer.com

TO: Andrew Roman Perrong, Esq.
Perrong Law LLC
Attorneys for Plaintiff
2657 Mount Carmel Avenue
Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com

Anthony Paronich, Esq.
Paronich Law, P.C.
Attorneys for Plaintiff
350 Lincoln St.
Suite 2400
Hingham, Massachusetts 02043
Phone: 617-485-0018
Fax: 508-318-8100
anthony@paronichlaw.com